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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 BIG ROCK ASSETS MANAGEMENT LLC, a
16 Nevada limited liability company,

17 Plaintiff,

18 v.

19 NATIONAL DEFAULT SERVICING
20 CORPORATION, BANK OF AMERICA, N.A.,
21 a national association; DOES I through X,
22 inclusive,

23 Defendants.

24 Case No.: 2:22-cv-00909-CDS-DJA

25 **STIPULATION AND ORDER FOR
26 EXTENSION OF TIME TO
27 RESPOND TO COMPLAINT**

28 **(THIRD REQUEST)**

19 Big Rock Assets Management, LLC and Bank of America, N.A. (**BANA**) stipulate that
20 BANA shall have an additional thirty (30) days, up to and including **September 12, 2022**, to file its
21 response to Big Rock's complaint, which is currently due on August 11, 2022.

22 Good cause exists to grant the requested extension since the parties are engaged in settlement
23 negotiations with respect to this case and another pending in the court. *See Big Rock Assets Mgmt.,*
24 *LLC v. MTC Financial Inc.*, No. 2:22-cv-1212-APG-NJK. The foreclosure sale related to the sister
25 case is scheduled on September 7, 2022. The parties are attempting to reach a global settlement
26 prior to the foreclosure sale. Incurring fees related to a response could impact a potential settlement.

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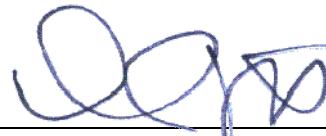
28 . . .

1 This is the parties' third request for an extension of this deadline and is not intended to cause
2 any delay or prejudice to any party.

3 DATED this 10th day of August, 2022.
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| <p>AKERMAN LLP</p> <p><u>/s/ Scott R. Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134</p> <p><i>Attorneys for Bank of America, N.A.</i></p> | <p>ANDREW BAO & ASSOCIATES</p> <p><u>/s/ Andrew A. Bao</u> ANDREW A. BAO, ESQ. Nevada Bar No. 10508 8020 S. Rainbow Boulevard, Suite 100-163 Las Vegas, NV 89139</p> <p><i>Attorneys for Big Rock Assets Management, LLC</i></p> |
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12 **IT IS SO ORDERED.**
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16 **UNITED STATES MAGISTRATE JUDGE**
17 Case No.: 2:22-cv-00909-CDS-DJA

18 August 15, 2022
19 **DATED:** _____